SEALED

June 15, 2022

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS By: SAJ

Deputy Clerk

September 28, 2022 CLERK, U.S. DISTRICT COURT

WESTERN DISTRICT OF TEXAS

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

·:	AD	
	DEPUTY	
	UNITED STATES OF AMERICA	
	Plaintiff	
	V	
	(A) IS A A C DOVCE CONTAILES	
	(4) ISAAC ROYCE GONZALES	
	D - f J 4	
	Defendant	

Case No: SA:22-CR-00311-FB(4)

1:22-mj-824-DH

GOVERNMENT'S MOTION FOR DETENTION HEARING, FOR DETENTION, AND FOR CONTINUANCE

TO THE UNITED STATES MAGISTRATE JUDGE:

The Government, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and pursuant to 18 U.S.C. § 3141, et. seq, moves for pretrial detention of Defendant; for a detention hearing regarding the above-named Defendant; and for a continuance of said hearing. In support of these motions, the Government shows as follows:

I. MOTION FOR DETENTION HEARING

§ 3142(f), as this matter involves one of more of the following:

an offense with a maximum sentence of life imprisonment or death

a qualifying controlled substance offense with a maximum sentence of 10 years or more

a felony offense that involves the possession or use of a firearm (including but not limited to felon in possession of a firearm), destructive device, or any other dangerous weapon

a felony offense that is a crime of violence as defined under 18 U.S.C. § 3156(a)(4) to

The Government requests that a hearing be set regarding detention pursuant to 18 U.S.C.

	include a felony offense under 18 U.S.C. chapter //, 109a, 110 or 11/							
	a felony offense that involves a minor victim							
	an offense that involves failure to register as a sex offender under 18 U.S.C. § 2250							
\boxtimes	a serious risk that the Defendant will flee							
	a serious risk that the Defendant will obstruct or attempt to obstruct justice							
II.	MOTION FOR DETENTION							
	Grounds for detention. The Government further requests that Defendant be detained							
pendir	ng trial in this case pursuant to 18 U.S.C. §§ 3141(a) and 3142(e), because no condition or							
combi	nation of conditions will reasonably assure:							
\boxtimes	Defendant's appearance as required							
	the safety of any other person or the community							
III.	MOTION FOR CONTINUANCE							
	Three-day continuance. Pursuant to 18 U.S.C. § 3142(f), the Government moves for a							
three-o	day continuance of the detention hearing in the matter.							
IV.	NOTICE OF REBUTTABLE PRESUMPTION IN FAVOR OF DETENTION							
	Presumption of detention. In addition, the Government gives notice that 18 U.S.C. §							
3142(e)(3) establishes a rebuttable presumption that no condition or combination of conditions							
will re	asonably assure the appearance of the person as required and the safety of the community,							
becaus	se there is probable cause to believe that Defendant committed:							
	a qualifying controlled substance offense with a maximum sentence of 10 years or more							
	an offense under 18 U.S.C. § 924(c)							
	an offense under 18 U.S.C. chapter 77 for which a maximum term of imprisonment of 20 years or more is prescribed							

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	a c	ıualıtı	ving	offense	invo	lving	a	minor	V1C1	tım
			7 0	01101100						

V. NOTICE OF APPLICABILITY OF TEMPORARY DETENTION OF UP TO 10 DAYS

Temporary detention. The Government gives notice, pursuant to 18 U.S.C. § 3142(d), that

Defendant is subject to temporary detention of up to ten days, as Defendant may flee or pose a

danger to any other person or the community, and Defendant was:

at the time the offense was committed, on release pending trial for a felony offense

at the time the offense was committed, on release pending imposition or execution of sentence, appeal of sentence or conviction, or completion of sentence for an offense

at the time the offense was committed, on probation or parole for an offense

and is not, a United States citizen or not admitted lawfully for permanent residence

Respectfully submitted,

ASHLEY C. HOFF

United States Attorney

BY: ____/s/____

Amy M. Hail

Assistant United States Attorney

Bar No: 5208954

601 NW Loop 410, Suite 600 San Antonio, Texas 78216-5512

Phone: (210) 384-7100 Email: amy.hail@usdoj.gov



UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNITED STATES OF AME	ARICA							
Plaintiff								
v								
(4) ISAAC ROYCE GONZA	LES							
Defendant								
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	<u>C</u>)RDE	<u>R</u>					
On this date the Court c	considered the	Gover	nment's Motio	n to De	tain Defer	ıdant	i, and	the
Court having reviewed said mo	tion finds that	it shou	ald be GRANT	ED.				
IT IS HEREBY ORI	DERED that	the Go	overnment's M	lotion t	o Detain	Defe	endan	ıt is
GRANTED.								
IT IS FURTHER	ORDERED	that	Defendant's	bond	hearing	is	set	for
	at a.	m. / p.	m.					
SIGNED AND ENTER	ED on: June 1	5, 202	2.					
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